

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WISCONSIN**

In the Matter of:

MAPLE LEAF CHEESE COOPERATIVE,

Debtor.

In Bankruptcy No.

20-13006-cjf

Chapter 11

**MAPLE LEAF CHEESE COOPERATIVE,
et al.,**

Plaintiffs,

Adversary Proceeding No. 21-00039

v.

MAPLE LEAF CHEESEMAKERS, INC.,

Defendant.

**PLAINTIFF MAPLE LEAF CHEESE COOPERATIVE'S
UNOPPOSED MOTION FOR CONTINUANCE OF TRIAL**

The Plaintiff, Maple Leaf Cheese Cooperative (the "Cooperative"), by its counsel Hansen Reynolds LLC, respectfully moves for a continuance of the trial currently scheduled to begin on July 27, 2022. The Cooperative seeks a continuance of the trial until either September or October of 2022, pending the Court's availability.

On Friday, July 8, 2022, and again on Saturday, July 9, 2022, Attorney Brent Nistler, lead counsel for the Cooperative, was admitted to the Emergency Room at Froedtert Hospital for two separate cardiac events diagnosed as supraventricular tachycardia. Attorney Nistler met with a cardiologist at Froedtert this morning, July 11, 2022, and was told he needed to undergo a Catheter Ablation surgical procedure. The procedure is expected to be scheduled in the next few days but is expected to occur in mid- late July. Attorney Nistler has been ordered to cut back his schedule

until cleared by his cardiologist following the procedure. Because Attorney Nistler is required for not only trial as the first chair, but also for much of the pretrial discovery that is ongoing, the Cooperative respectfully requests the Court grant a continuance of the trial.

Upon request from either the Court or Opposing Counsel, we are willing to provide documentation from Froedtert on his condition and the restrictions, either by submitting redacted medical records or unredacted records for the Court's in camera review.

Continuing the trial would not prejudice or inconvenience any of the parties because the Cooperative is only requesting a two-to-three-month continuance to allow Attorney Nistler to recover. Further, the Defendant Maple Leaf Cheesemakers, Inc. ("MLC"), does not oppose this motion and in fact has proposed a new schedule:

1. MLC's deadline to submit expert reports will be postponed until two weeks before the next trial date.
2. Discovery will be stayed until twenty-one days from the trial date.
3. The deadline to submit Exhibits and Witnesses will be fourteen days before trial and objections will be due seven days before trial.
4. The deadline to submit Findings of Fact and Conclusions of Law and optional briefs will be seven days before trial.
5. All other motions will be due fifteen days before the trial date.

The movants are mindful of the Court's desire to try this case and we regret having to make this request. We would not do so absent this type of circumstance. We also recognize the Court's busy docket and will work diligently to find new trial dates that comport with the Court's and defendant's schedules.

For the foregoing reasons, the Cooperative respectfully requests that the Court grant the motion and enter an order continuing the trial until September or October of 2022, pending the Court's availability.

Dated this 11th day of July, 2022.

HANSEN REYNOLDS LLC

By: Electronically signed by Brent D. Nistler

Brent D. Nistler

Timothy M. Hansen¹

thansen@hansenreynolds.com

bnistler@hansenreynolds.com

Hansen Reynolds LLC

301 N. Broadway, Suite 400

Milwaukee, WI 53202

Ph: 414-455-7676

Attorneys for Plaintiff

¹ Timothy M. Hansen prepared this document. His Notice of Appearance is forthcoming. We are filing this Motion under Brent's signature with his permission.